UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP, CALIFORNIA STATE TEACHERS' RETIREMENT SYSTEM, SONTERRA CAPITAL MASTER FUND, LTD., FRONTPOINT PARTNERS TRADING FUND, L.P., AND FRONTPOINT AUSTRALIAN OPPORTUNITIES TRUST on behalf of themselves and all others similarly situated,

Docket No. 13-cv-02811(PKC)

ECF Case

Plaintiffs,

- against -

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., BNP PARIBAS S.A., CITIGROUP, INC., CITIBANK, N.A., COÖPERATIEVE CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., CRÉDIT AGRICOLE S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE BANK AG, DB GROUP SERVICES UK LIMITED, HSBC HOLDINGS PLC, HSBC BANK PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P. MORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., THE ROYAL BANK OF SCOTLAND PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND JOHN DOE NOS. 1-50,

Defendants.

PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT WITH HSBC HOLDINGS PLC AND HSBC BANK PLC

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Declarations of Vincent Briganti, Esq., Christopher Lovell, Esq., and Gary McGowan, Esq., and the exhibits attached thereto, including the Settlement Agreement ("Settlement"), and the record herein, Plaintiffs, by and through their undersigned counsel, will respectfully move this Court, before the Honorable P. Kevin Castel, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on a date and time to be set by the Court, for an order granting Plaintiffs' motion for preliminary approval of the Settlement

between Plaintiffs and HSBC Holdings plc and HSBC Bank plc and for other relief set forth in the proposed order annexed hereto.

Dated: White Plains, New York January 11, 2017

By: /s/ Vincent Briganti

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By: <u>/s/ Christopher Lovell</u>

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